

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
SHREVEPORT DIVISION**

GLOBAL GAMING LEGENDS, LLC,
et al.

VERSUS

LEGENDS GAMING OF LOUISIANA-1, LLC,
et al.

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CIVIL ACTION NO. 13-3123

JUDGE HICKS

MAGISTRATE JUDGE HORNSBY

**JOINT STIPULATION AND AGREED ORDER EXTENDING
SCHEDULING ORDER DEADLINES AND TRIAL DATE**

Pursuant to Rules 16 and 29 of the Federal Rules of Civil Procedure, Plaintiffs Global Gaming Legends, LLC, Global Gaming Vicksburg, LLC, Global Gaming Bossier City, LLC and Global Gaming Solutions, LLC (“Global”); Defendants and Plaintiffs-in-Counter-Claim, Louisiana Riverboat Gaming Partnership, Legends Gaming of Louisiana-1, LLC, Legends Gaming of Louisiana-2, LLC, Legends Gaming, LLC, and Legends Gaming of Mississippi, LLC, (“Legends”); and Wilmington Trust Company, solely in its capacity as Administrative Agent under the Amended and Restated First Lien Credit Agreement, dated as of August 31, 2009, with the ad hoc group of lenders under the Amended and Restated First Lien Credit Agreement (the “First Lien Parties”) who have intervened in the above-captioned adversary proceeding, through their respective counsel, hereby jointly submit this stipulation and proposed order extending the deadlines set forth in the Amended Scheduling Order entered on November 18, 2014 [R. Doc. 164] (the “Scheduling Order”).

IT IS HEREBY STIPULATED AND AGREED that:

1. **DISCOVERY** — Fact depositions for use at trial shall be taken and all discovery shall be completed, including the filing of any motions to compel, no later than JUNE 5, 2015.

The parties agree to negotiate in good faith to extend these dates if necessary to accommodate any additional discovery ordered by the Court or agreed to by the parties, including, but not limited to, relief arising from motions to compel as contemplated in paragraph 2 below.

2. MOTIONS TO COMPEL — Motions to compel with respect to outstanding discovery shall be filed the later of seven (7) days after (i) expiration of the time to file objections to the Magistrate's order concerning Legends' Motion to Quash/Motion for a Protective Order on the 30(b)(6) deposition of Legends corporate representative regarding its document collection and preservation efforts (the "Legends Document Custodian Deposition") or, (ii) the District Court has ruled on any timely objections to such order in accordance with Fed.R.Civ.P 72(a) or as otherwise ordered by the Court ~~or agreed to by the parties.~~

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3. EXPERT REPORTS — Written reports of experts, who may be witnesses, shall be obtained and exchanged by the parties no later than JUNE 5, 2015. The deadline to complete expert depositions is JULY 3, 2015.

4. REBUTTAL EXPERT REPORTS — Written reports of experts, who may be rebuttal witnesses, shall be obtained and exchanged by the parties no later than JUNE 19, 2015.

5. PRE-TRIAL MOTIONS — All pre-trial motions, excluding dispositive motions, shall be filed no later than AUGUST 3, 2015. Any responses or oppositions to pre-trial motions, excluding dispositive motions, shall be filed no later than AUGUST 21, 2015 and any replies in support of pre-trial motions, excluding dispositive motions, shall be filed no later than AUGUST 31, 2015. The deadline for filing dispositive motions is JUNE 16, 2015. The parties agree that any responses or oppositions to dispositive motions shall be filed no later than JUNE 30, 2015 and any replies in support of dispositive motions shall be filed no later than JULY 10, 2015.

6. BENCH TRIAL — Trial will commence on/or during the week beginning
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OCTOBER 19, 2015 ~~(or as soon thereafter as the parties may be heard)~~ before the District Judge.

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7. WITNESSES AND EXHIBITS — Counsel for the parties shall file in the record
and serve upon their opponents a list of all witnesses who may or will be called to testify at trial,
and all exhibits that may or will be used at trial no later than OCTOBER 6, 2015.

8. SETTLEMENTS — Counsel shall contact the Magistrate Judge's office as soon
as possible for the purpose of scheduling a Settlement Conference to be held on or before,
SEPTEMBER 1, 2015.

9. FINAL PRE-TRIAL CONFERENCE — A final Pre-Trial Conference shall be
@ 10:00 a.m.
held on SEPTEMBER 16, 2015. Trial counsel shall appear in person. A joint proposed Pre-
Trial Order shall be submitted to chambers electronically and by-hand no later than
SEPTEMBER 10, 2015.

MLH

10. RESERVATION OF RIGHTS. Nothing herein shall be deemed an admission or
concession on any matters pending before the Court concerning the timing and propriety of any
requested discovery, including, without limitation, the Rule 30(b)(6) deposition referenced in
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paragraph 8 hereof.

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DATED: February 18, 2015

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BY: /s/ Louis M. Phillips

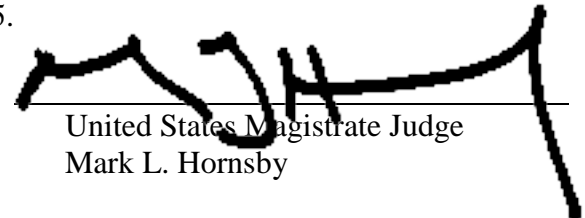
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IT IS SO ORDERED.

Shreveport, Louisiana, this 18 day of February 2015.

BY:


United States Magistrate Judge
Mark L. Hornsby